

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

PENSKE MEDIA CORPORATION,

Plaintiff,

-against-

SHUTTERSTOCK, INC.,

Defendant.

Case No. 20-cv-04583 (MKV)

NOTICE OF MOTION

PLEASE TAKE NOTICE THAT, upon the accompanying Memorandum of Law, Rule 56.1 Statement of Undisputed Facts, the Declaration of Benjamin Melvin, and the Declaration of Eleanor M. Lackman, defendant-counterclaim plaintiff Shutterstock, Inc. (“Shutterstock”), by its undersigned attorneys, will move this Court at the United States District Court, Southern District of New York, 500 Pearl Street, New York, New York 10007, before the Honorable Mary Kay Vyskocil, on a date and time to be designated by the Court, for an order pursuant to Fed. R. Civ. P. 56, adjudicating the second cause of action in plaintiff Penske Media Corporation’s (“PMC”) Amended Complaint (refiled as Dkt. No. 149) in favor of Shutterstock and against PMC, with prejudice, and for such other and further relief as the Court may deem just and proper.

PLEASE TAKE FURTHER NOTICE THAT, pursuant to Shutterstock’s and PMC’s stipulated briefing schedule, any Opposition must be filed by April 19, 2023, and the Reply must be filed by May 3, 2023.

DATED: Los Angeles, California
March 17, 2023

Respectfully submitted,

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